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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
--X
SECURITIES INVESTOR PROTECTION   :
CORPORATION,   : Adv. Pro. No. 08-01789 (BRL)
                                          :
           Plaintiff-Applicant,   : SIPA LIQUIDATION
                                          :
           v.   : (Substantively Consolidated)
                                          :
BERNARD L. MADOFF INVESTMENT   :
SECURITIES, L.L.C.,   :
                                          :
                    Defendant.   :
--X
In re: :
                                          :
BERNARD L. MADOFF,   :
                                          :
                    Debtor.   :
--X
IRVING H. PICARD, Trustee of the   :
Liquidation of Bernard L. Madoff   :
Investment Securities, L.L.C.,   : Adv. Pro. No. 10-05415 (BRL)
                                          :
                    Plaintiff,   : **REPLY DECLARATION**
                                          :
           v.   :
                                          :
AMERICAN SECURITIES   :
MANAGEMENT, L.P., formerly known   :
as AMERICAN SECURITIES, L.P.,   :
et al.   :
                                          :
                    Defendants.   :
--X

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DANIEL J. KORNSTEIN hereby declares:

1.   I am a member of Kornstein Veisz Wexler & Pollard, LLP, counsel for the Moving Defendants in this adversary proceeding.

2.   I make this reply Declaration in further support of the motion made by Moving Defendants pursuant to 28 U.S.C. § 157(d) to withdraw the reference of this adversary proceeding to the Bankruptcy Court.

3.   Attached hereto as Exhibit H is a copy of the transcript from the July 1, 2011 oral argument on the motion to withdraw the reference in Picard v. Katz, 11 Civ. 3605 (S.D.N.Y.) (Rakoff, J.).

4.   Attached hereto as Exhibit I is a copy of February 27, 2012 opinion on plaintiff's motion for summary judgment made in Jacobson Family Investments, Inc. v. National Union Fire Ins. Co. of Pittsburgh, PA, Index No. 601325/10 (Sup. Ct. N.Y. Co.) (Lowe, J.).

5.   For the reasons given in the accompanying Reply Memorandum of Law and in the Moving Defendants' original moving papers, the Moving Defendants' motion to withdraw the reference to the Bankruptcy Court should be granted.

I, DANIEL J. KORNSTEIN, declare under penalty of perjury that the foregoing is true and correct. Executed on March 16, 2012.

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DANIEL J. KORNSTEIN